

Comment on NPRM WT Docket No. 04-140

This submission is an addendum to my previously filed comment on the matter of **Multiple Vanity Applications** filed June 2, 2004.

I have had several discussions with other interested and knowledgeable radio amateurs regarding my comment to the Commission proposing that vanity filers be limited to one application per day. In order to provide a more complete general specification the following notations must be incorporated:

- The Online Filing System, accessible from the FCC Universal Licensing System (ULS) website, must allow vanity filers to edit an application later on the same day it was entered (Pending Level 1 Status). This must be implemented before FCC limits filers to just one vanity application per day.
- The Online Filing System must identify vanity filers, known by FRN or Club Trustee call sign, and prevent them from filing more than one application on a holiday or weekend *and* the first business day after the holiday or weekend. In other words, if you file a vanity application on the weekend, you cannot file again on Monday. This is necessary because applications filed on days FCC is closed are officially received at 9:00 AM on the next business day and are commingled with applications filed that day.
- Paper vanity applications will require a procedural method to handle an application that cannot be entered into the system because the filer has already entered one using the Online Filing System the same day. The paper application must not supersede the previously filed online application. This may not be a problem assuming that FCC already has a procedure for handling applications filed without signature, filed on an expired call sign, or having any other fatal flaw.

In summary, I believe that the **Proposed Solution** previously filed, along with this addendum, provides for modest and easily implemented changes to the current Online Filing System which will fulfill the FCC goal of providing “*equity and fairness*” in the assignment of vanity call signs.

Respectfully submitted,

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